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Attorney for Defendant
GABRIEL ERASMO CABRERA

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No. 2:25-cr-00130-JAM
)	
Plaintiff,)	STIPULATION AND ORDER TO
)	CONTINUE STATUS CONFERENCE, TO
v.)	CONVERT STATUS CONFERENCE TO
)	CHANGE OF PLEA HEARING ON
GABRIEL ERASMO CABRERA,)	SEPTEMBER 23, 2025, AND EXCLUDE
)	TIME
Defendant.)	
)	Judge: Hon. John A. Mendez

GABRIEL ERASMO CABRERA, by and through his attorney of record, Assistant Federal Defender Megan T. Hopkins, and the UNITED STATES, by and through its attorney of record, Douglas Harman, hereby stipulate to and request an order from this Court converting the status conference in this matter to a change of plea, and continuing the hearing from August 5, 2025, at 9:00 a.m. to September 23, 2025, at 9:00 a.m.

Mr. Cabrera has graduated from the WestCare residential drug treatment program in Fresno, CA and is working diligently with his counsel to complete a review of his discovery in his two pending cases¹. The government and defense have reached an agreement regarding the terms of a resolution in both matters, and have determined that September 23, 2025 is a mutually convenient date for a change of plea, which will allow for a completion of discovery review prior

¹ Mr. Cabrera is charged separately in the instant case, as well as in case number 2:25-cr-00033-JAM.

1 to the hearing date. Therefore, the parties respectfully request to convert the status conference to
2 a change of plea hearing, and schedule it for September 23, 2025, at 9:00 a.m. The parties also
3 jointly move that the court excludes time between August 5, 2025 and September 23, 2025
4 pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a
5 continuance granted by the Court at defendant's request on the basis of the Court's finding that
6 the ends of justice served by taking such action outweigh the best interest of the public and the
7 defendant in a speedy trial.

8
9 Dated: July 28, 2025

Respectfully submitted,

10 HEATHER E. WILLIAMS
11 Federal Public Defender

12 /s/ Megan T. Hopkins
13 MEGAN T. HOPKINS
14 Assistant Federal Defender
Attorney for Defendant
Gabriel Erasmo Cabrera

15 KIMBERLY A. SANCHEZ
16 Acting United States Attorney

17 DATED: July 28, 2025

18 /s/ J. Douglas Harman
19 J. DOUGLAS HARMAN
20 Assistant United States Attorney
21 Attorney for Plaintiff
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ORDER

Based on the stipulation of the parties, the August 05, 2025 status conference is **CONTINUED** and **CONVERTED** to a **change of plea hearing** on **September 23, 2025, at 9:00 a.m.** Time is **EXCLUDED** between August 05, 2025, and September 23, 2025, as described in the parties' Stipulation.

IT IS SO ORDERED.

Dated: July 28, 2025

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE